

**IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN
DISTRICT OF OKLAHOMA**

CORDELL JOHNSON,
Plaintiff,

vs.

Case No. CIV-16-1061-R

**CORRECTIONS CORPORATION
OF AMERICA, INC.,**

and,

TERRANCE LOCKETT,
Defendants.

DEFENDANTS' FINAL WITNESS LIST

COMES NOW Defendant CCA, pursuant to this Court's Amended Scheduling Order,
and hereby submitting the following witness list.

WITNESSES:

* denotes "likely to be called," as directed by this Court's Scheduling Order.

			Testimony
1.	Raymond Byrd*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Mr. Byrd was facility Warden at Cimarron Correctional Facility on 9/12/15, the date of the incident underlying Plaintiff's complaint. He was present at the prison facility and responded to the incident on the CN housing unit and established an incident command post. He will testify about the prison facility's policies, security operations, staffing, training, and supervision of staff and inmates. He will also testify regarding Plaintiff and Plaintiff's institutional history.
2.	Larry Cox*	c/o CCF 3200 Kings Hwy	Mr. Cox was facility Chief of Security on 9/12/15. He responded to the incident on

		Cushing, Oklahoma 74023 918.225.3336	the CN housing unit and helped direct the facility's response to the inmate gang fight. He is expected to testify about the prison facility's policies, security operations, staffing, training, and supervision of security staff and inmates. He will also testify regarding Plaintiff and Plaintiff's institutional history.
3.	Robert Meszaros*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Mr. Meszaros was the Shift Captain on 9/12/15 at the time of the incident on the CN housing unit. He responded to the CN housing unit incident and helped direct the emergency response. He will testify about the prison facility's security operations, staffing, training, and supervision of staff. He will also testify regarding Plaintiff's institutional history.
4.	Scott Hunsucker*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Mr. Hunsucker was the Shift Lieutenant on 9/12/15 at the time of the incident on the CN housing unit. He responded to the CN housing unit incident and helped direct the emergency response. He will testify about the prison facility's security operations, staffing, training, and supervision of staff.
5.	John Hilligoss*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Mr. Hilligoss was Chief of Unit Management for Cimarron Correctional Facility on 9/12/15. He was not present at the facility at the time of the incident. He subsequently reviewed incident response materials and spoke with staff and inmates regarding the incident of 9/12/15. He will testify about the prison facility's unit management, housing and security operations, inmate security threat groups, staffing, training, and supervision of staff and inmates. He will also testify regarding Plaintiff and Plaintiff's institutional history. Following the incident of 9/12/15, he assisted in the identification of inmates involved in the incident.
6.	Tommy Battles*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Mr. Battles was the Unit Manager for the CN housing unit at the time of the 9/12/15 incident. He came to the facility shortly after the incident had ended. He entered the housing unit after the incident had occurred and subsequently reviewed

			incident response materials and spoke with staff and inmates regarding the incident of 9/12/15. He is expected to testify about the prison facility's housing and security operations, inmate security threat groups, staffing, training, and supervision of staff and inmates. He will also testify regarding Plaintiff and Plaintiff's institutional history. Following the incident of 9/12/15, he assisted in the identification of inmates involved in the incident.
7.	Lisa Shannon*	c/o Darrell Moore J. Ralph Moore, P.C. P.O. Box 368 Pryor, OK 74362 (918) 825-0332	Ms. Shannon was the Case Manager for inmates assigned to the CN housing unit at the time of the 9/12/15 incident. She was not present at the facility at the time of the incident. She is expected to testify about the prison facility's housing and security operations, inmate security threat groups, supervision of inmates, and Plaintiff and Plaintiff's institutional history. Following the incident of 9/12/15, she assisted in the identification of inmates involved in the incident.
8.	Terrance Lockett*	C/O William Lunn	Mr. Lockett was a Corrections Officer posted inside the CN housing unit on 9/12/15 and at the time of the incident underlying Plaintiff's complaint. He is expected to testify as regards the incident of 9/12/15. He is also expected to testify as regards his training as a corrections officer and his own medical, social, educational, and employment history.
9.	Jessica Tanner*	c/o Darrell Moore J. Ralph Moore, P.C. P.O. Box 368 Pryor, OK 74362 (918) 825-0332	Ms. Tanner was posted as a Corrections Officer in another housing unit at the prison facility at the time of the 9/12/15 incident. She responded to the incident on the CN housing unit, she entered the housing unit, assisted in restraining inmates and participated in the emergency response. She is expected to testify about the prison facility's security operations, staffing, training, and supervision of inmates. She will also testify regarding Plaintiff's institutional history.
10	Hector Cruz*	c/o CCF 3200 Kings Hwy	Mr. Cruz was working as a Corrections Counselor at the prison facility at the time

		Cushing, Oklahoma 74023 918.225.3336	of the 9/12/15 incident. He responded to the incident on the CN housing unit, he entered the housing unit, assisted in restraining inmates and securing the housing unit, and escorted inmates to other locations within the prison facility.
11	Vanessa Walls	c/o Darrell Moore J. Ralph Moore, P.C. P.O. Box 368 Pryor, OK 74362 (918) 825-0332	Ms. Walls was posted as a Corrections Officer in another housing unit at the prison facility at the time of the 9/12/15 incident. She responded to the incident on the CN housing unit, entered the housing unit, assisted in restraining inmates, and participated in the emergency response. She is expected to testify about the prison facility's security operations, staffing, training, and supervision of inmates. She is also expected to testify regarding Plaintiff's institutional history. Following the incident of 9/12/15, she assisted in the identification of inmates involved in the incident.
12	Cassandra Rucker*	c/o Darrell Moore J. Ralph Moore, P.C. P.O. Box 368 Pryor, OK 74362 (918) 825-0332	Ms. Rucker was posted as a Corrections Officer in another housing unit at the prison facility at the time of the 9/12/15 incident. She responded to the incident on the CN housing unit, she entered the housing unit, assisted in restraining inmates and participated in the emergency response. She is expected to testify about the prison facility's security operations, staffing, training, and supervision of inmates. She is also expected to testify regarding Plaintiff's institutional history.
13	Michael Neefe*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Mr. Neefe was the facility Chaplain at the prison facility at the time of the 9/12/15 incident. He responded to the incident on the CN housing unit, entered the housing unit, assisted with the emergency response, provided CPR to injured inmates, and assisted in the movement of injured inmates.
14	Jennifer Silvers	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Ms. Silvers was posted as a Corrections Officer in another housing unit at the prison facility at the time of the 9/12/15 incident. She responded to the incident and participated in the emergency response.

			She is expected to testify about the incident response and movement of injured inmates.
15	Teresa Patterson*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Ms. Patterson was working as a Licensed Practical Nurse at the prison facility at the time of the 9/12/15 incident. She responded to the incident on the CN housing unit, entered the housing unit, assisted in providing medical care to injured inmates on the housing unit, and continued providing medical care to injured inmates in the prison facility's medical clinic.
16	Laura Palmer-Neefe*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Ms. Palmer-Neefe was working as a Registered Nurse at the prison facility at the time of the 9/12/15 incident. She responded to the incident on the CN housing unit, entered the housing unit, assisted with the emergency medical care response on the CN housing unit and in the prison facility's medical clinic. She is expected to testify about the prison facility's medical operations during the time of the incident and medical care provided to Plaintiff until his release from prison during May 2016.
17	Juan Melendez*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Mr. Melendez was posted as a Corrections Officer at the prison facility at the time of the 9/12/15 incident. He responded to the incident on the CN housing unit, entered the housing unit, assisted in restraining inmates and participated in the emergency response. He is expected to testify about the prison facility's security operations, staffing, training, and supervision of inmates.
18	Nelson Cruz*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Mr. Cruz was posted as a Corrections Officer at the prison facility at the time of the 9/12/15 incident. He responded to the incident on the CN housing unit, entered the housing unit, assisted in restraining inmates and participated in the emergency response. He is expected to testify about the prison facility's security operations, staffing, training, and supervision of

			inmates. He is also expected to testify regarding Plaintiff's institutional history.
19	John Williams*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Mr. Williams was posted as a Corrections Officer, working in Central Control in the prison facility at the time of the 9/12/15 incident. He assisted with coordination of the emergency response to the incident on the CN housing unit. He is expected to testify about the prison facility's security operations on 9/12/15.
20	Megan Pearman*	c/o Darrell Moore J. Ralph Moore, P.C. P.O. Box 368 Pryor, OK 74362 (918) 825-0332	Ms. Pearman was posted as a Corrections Officer in another housing unit at the prison facility at the time of the 9/12/15 incident. She responded to the incident on the CN housing unit, she entered the housing unit, assisted in restraining inmates and participated in the emergency response. She is expected to testify about the prison facility's security operations, staffing, training, and supervision of inmates. She is also expected to testify regarding Plaintiff's institutional history.
21	Michelle Bass*	c/o Darrell Moore J. Ralph Moore, P.C. P.O. Box 368 Pryor, OK 74362 (918) 825-0332	Ms. Bass was working as a Licensed Practical Nurse at the prison facility at the time of the 9/12/15 incident. She responded to the incident on the CN housing unit, entered the housing unit, assisted in providing medical care to injured inmates on the housing unit, and continued providing medical care to injured inmates in the prison facility's medical clinic. She is also expected to testify regarding Plaintiff's institutional history.
22	Jason Schechter	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Mr. Schechter was a Senior Corrections Officer at the time of the 9/12/15 incident. He responded to the prison facility at the time of the incident on the CN housing unit. He accompanied emergency vehicles to the hospital in Cushing and provided security over-watch on Plaintiff at the hospital in Cushing, Oklahoma. He is expected to testify about the prison facility's security operations, staffing, training, and supervision of inmates. He is

			also expected to testify regarding Plaintiff's institutional history.
23	Gary Campbell*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Mr. Campbell was a Corrections Officer at the time of the 9/12/15 incident. He responded to the prison facility at the time of the incident on the CN housing unit. He was posted as security over-watch on Plaintiff at the hospital in Cushing, Oklahoma. He is expected to testify about the prison facility's security operations, staffing, training, and supervision of inmates. He is also expected to testify regarding Plaintiff's institutional history.
24	Greg Williams*	ODOC 3400 Martin Luther King Ave OKC, OK	Mr. Williams was the Division Manager, Division of West Institutions, Oklahoma Department of Corrections.
25	Phillip Baker*	ODOC 3400 Martin Luther King Ave OKC, OK	Mr. Baker was a Contract Monitor for the Oklahoma Department of Corrections working at Cimarron Correctional Facility.
26	Natalie Cooper	ODOC 3400 Martin Luther King Ave OKC, OK	Ms. Cooper was a Contract Monitor for the Oklahoma Department working at Cimarron Correctional Facility.
27	Robert Hert, III*	ODOC 3400 Martin Luther King Ave OKC, OK	Mr. Hert is an Agent with the Office of Inspector General for the Oklahoma Department of Corrections. He is expected to testify regarding an investigation he performed of the 9/12/15 incident on the CN housing unit, Cimarron Correctional Facility.
28	Haley Hamlin*	c/o Oklahoma Department of Corrections, DOC #672911, Eddie Warrior Correctional P.O. Box 315 Taft, OK 74463- 0315	Ms. Hamlin is an inmate who on 9/12/15 had been romantically involved with one of the deceased offenders, Kyle Tiffée. She is expected to testify to her knowledge regarding the prison gang activities of the Irish Mob and the UAB.
29	Terry Tiffée*	c/o J. Spencer Bryan, 9 E. 4 th Street, Ste. 307, Tulsa, OK 74103	Ms. Tiffée is a former OK DOC inmate and the mother of one of the deceased offenders, Kyle Tiffée. She is expected to testify regarding her knowledge of the

		918.935.2777	prison gang activities of the Irish Mob and the UAB.
30	Cordell Johnson*	c/o J. Spencer Bryan, 9 E. 4 th Street, Ste. 307, Tulsa, OK 74103 918.935.2777	Plaintiff.
31	Jared Cruce*	c/o Oklahoma Department of Corrections DOC #454513	Inmate gang member of the UAB, participated in the gang fight on CN housing unit on 9/12/15. He is expected to testify to his knowledge regarding the prison gang activities of the Irish Mob and the UAB.
32	Dylan Shanks*	c/o Oklahoma Department of Corrections DOC #280876	Inmate gang member of the UAB. He is expected to testify to his knowledge regarding the prison gang activities of the Irish Mob and the UAB.
33	Larry Tosh*	c/o Oklahoma Department of Corrections DOC #237340	Inmate gang member of the Irish Mob. He is expected to testify to his knowledge regarding the prison gang activities of the Irish Mob and the UAB.
34	Shawn Schneider*	c/o Oklahoma Department of Corrections DOC #438871	Inmate gang member of the Irish Mob. Participated in the gang fight on CN housing unit on 9/12/15. He is expected to testify to his knowledge regarding the prison gang activities of the Irish Mob and the UAB.
35	Christopher Shepherd	c/o Oklahoma Department of Corrections DOC #193026	Inmate gang member of the UAB. He is expected to testify to his knowledge regarding the prison gang activities of the Irish Mob and the UAB.
36	Brandon Maxwell	c/o Oklahoma Department of Corrections DOC #651311	Inmate gang member of the UAB. He is expected to testify to his knowledge regarding the prison gang activities of the Irish Mob and the UAB.
37	Joshua Tolley	8507 E. 11 th Tulsa, OK 74112	Inmate gang member of the Irish Mob. Participated in the gang fight on CN housing unit on 9/12/15. He is expected to testify to his knowledge regarding the prison gang activities of the Irish Mob and the UAB.
38	Jason McHone	c/o Oklahoma Department of Corrections DOC #205513	Inmate gang member of the Irish Mob. Participated in the gang fight on CN housing unit on 9/12/15. He is expected to testify to his knowledge regarding the

			prison gang activities of the Irish Mob and the UAB.
39	Steven Thompson	c/o Oklahoma Department of Corrections DOC #703298	Inmate gang member of the Irish Mob. Participated in the gang fight on CN housing unit on 9/12/15. He is expected to testify to his knowledge regarding the prison gang activities of the Irish Mob and the UAB.
40	William Fulk*	Okay, Oklahoma 74447	Witness to gang fight on CN housing unit on 9/12/15.
41	Richard Ayala	c/o Oklahoma Department of Corrections DOC #224232	Inmate gang member housed on CN housing unit on 9/12/15. He is expected to testify to his knowledge regarding prison gang activities.
42	Shannon Bandy*	c/o Darrell Moore J. Ralph Moore, P.C. P.O. Box 368 Pryor, OK 74362 (918) 825-0332	Former Human Resources manager at Cimarron Correctional Facility. She will testify regarding staffing and recruitment at Cimarron Correctional Facility.
43	Lenita Gillespie*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Business Manager, Cimarron Correctional Facility. She will testify regarding business operations at the Cimarron facility.
44	Kari Kaiser*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Current Quality Assurance Manager at Cimarron Correctional Facility. She will testify regarding quality assurance measures at Cimarron Correctional Facility.
45	Cheryl Kazlaskas	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Former Quality Assurance Manager at Cimarron Correctional Facility. She will testify regarding quality assurance measures at Cimarron Correctional Facility.
46	Lorrie Belcher	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Current Human Resources manager at Cimarron Correctional Facility. She will testify regarding staffing and recruitment at Cimarron Correctional Facility.
47	Mark Swafford*	Detective, Sapulpa Police Department, 20 N. Walnut St., Sapulpa, OK 74066	He will testify regarding forensic download of contraband cellphone recovered from Christopher Tignor.

		(918) 224-3862	
48	Danni Creech*	Board of Medicolegal Investigations, Office of Chief Medical Examiner, 901 N. Stonewall, Oklahoma City, OK 73117	She will testify regarding contraband cellphone recovered from Christopher Tignor.
49	Martin Reed	ODOC 3400 Martin Luther King Ave OKC, OK (405) 425-2515	Mr. Reed is an Agent with the Office of Inspector General for the Oklahoma Department of Corrections. He is expected to testify regarding an investigation he performed of the 9/12/15 incident on the CN housing unit, Cimarron Correctional Facility.
50	Cheri Bolz	ODOC 3400 Martin Luther King Ave OKC, OK (405) 425-2515	Ms. Bolz is an Agent with the Office of Inspector General for the Oklahoma Department of Corrections. She is expected to testify regarding an investigation she performed of the 9/12/15 incident on the CN housing unit, Cimarron Correctional Facility.
51	Rachael Rogers	ODOC 3400 Martin Luther King Ave OKC, OK (405) 425-2515	Ms. Rogers is an Agent with the Office of Inspector General for the Oklahoma Department of Corrections. She is expected to testify regarding an investigation she performed of the 9/12/15 incident on the CN housing unit, Cimarron Correctional Facility.
52	Greg Jones*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Facility investigator, Cimarron Correctional Facility.
53	Todd Hill*	c/o Oklahoma Department of Corrections DOC #699938	Witness to gang fight on CN housing unit on 9/12/15.
54	Gage Broom	c/o Oklahoma Department of Corrections DOC #606294	Inmate gang member of the Irish Mob. Participated in the gang fight on CN housing unit on 9/12/15. He is expected to testify to his knowledge regarding the prison gang activities of the Irish Mob and the UAB.

55	Johnathan Olive*	2999 Sandstone Rd Durant, OK 74701	Witness to gang fight on CN housing unit on 9/12/15.
56	Ashton W. Kelle	c/o Oklahoma Department of Corrections DOC #604566	Inmate gang member of the Irish Mob. Participated in the gang fight on CN housing unit on 9/12/15. He is expected to testify to his knowledge regarding the prison gang activities of the Irish Mob and the UAB.
57	Kenneth Harris*	c/o Oklahoma Department of Corrections DOC #516004	Inmate gang member housed on CN housing unit on 9/12/15. He is expected to testify to his knowledge regarding the prison gang activities of the Irish Mob and the UAB.
58	Joshua Boffer	c/o Oklahoma Department of Corrections DOC #469661	Inmate gang member of the UAB. He is expected to testify to his knowledge regarding the prison gang activities of the Irish Mob and the UAB.
59	Jesse Hood	c/o Oklahoma Department of Corrections DOC #444271	Inmate gang member of the UAB. Participant in gang fight on 9/12/15. He is expected to testify to his knowledge regarding the prison gang activities of the Irish Mob and the UAB.
60	Richard Potts	c/o Oklahoma Department of Corrections DOC #228458	Inmate gang member of the UAB. He is expected to testify to his knowledge regarding the prison gang activities of the Irish Mob and the UAB.
61	Charles Paine*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Facility physician, Cimarron Correctional Facility
62	Gary Deland*	c/o Darrell Moore J. Ralph Moore, P.C. P.O. Box 368 Pryor, OK 74362 (918) 825-0332	Expert witness retained by Defendant.
63	Curtis T. Grundy, Ph.D.*	c/o Darrell Moore J. Ralph Moore, P.C. P.O. Box 368 Pryor, OK 74362 (918) 825-0332	Expert witness retained by Defendant.
64	Julie Rose*	ODOC 3400 Martin Luther King Ave OKC, OK	Administrative Director, Division of West Institutions, Oklahoma DOC


		(405) 425-2515	
65	Ken Avant*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Facility Management
66	Tim Wilkinson *	c/o Darrell Moore J. Ralph Moore, P.C. P.O. Box 368 Pryor, OK 74362 (918) 825-0332	Former Warden, Davis Correctional Facility and Cimarron Correctional Facility
67	Scott Whitson	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Facility Management & Maintenance
68	Gerald Ragan*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Maintenance supervisor, Cimarron Correctional Facility
69	Jeorld Braggs	ODOC 3400 Martin Luther King Ave OKC, OK (405) 425-2515	Former Assistant Warden, Cimarron Correctional Facility
70	Mark Mowers*	c/o Darrell Moore J. Ralph Moore, P.C. P.O. Box 368 Pryor, OK 74362 (918) 825-0332	Corrections Sergeant, Davis Correctional Facility. He is expected to testify to his knowledge regarding the prison gang activities of the Irish Mob and the UAB.
71	Frank O'Clair*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Kitchen Supervisor, Cimarron Correctional Facility
72	Jacob Gibson*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Corrections Sergeant, Cimarron Correctional Facility. He is expected to testify to his knowledge regarding the prison gang activities of the Irish Mob and the UAB and the participants in the incident of 9/12/15.
73	Sylvia Waters*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023	Classifications supervisor, Cimarron Correctional Facility. She is expected to testify to her knowledge regarding the inmate classifications of the Irish Mob and

		918.225.3336	the UAB participants in the incident of 9/12/15.
74	Mike Munday*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Training manager, Cimarron Correctional Facility. He is expected to testify regarding the training program at the prison facility.
75	Tim Plourd	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Corrections Sergeant, Cimarron Correctional Facility. He is expected to testify to his knowledge regarding the prison gang activities of the Irish Mob and the UAB.
76	All witnesses listed by Plaintiff and not objected to by Defendant.		
77	All witnesses necessary for the purposes of authentication.		
78	All witnesses necessary for the purposes of rebuttal.		
79	All witnesses necessary for the purposes of impeachment.		

Defendant reserves the right to supplement this list as discovery is ongoing.

Respectfully submitted,

Defendant CCA

By: 
 DARRELL L. MOORE, OBA 6332
 P.O. Box 368
 Pryor, OK 74362
 (918) 825-0332/7730 (fax)
 darrellmoore@jralphmoorepc.com
 Attorney for Defendant CCA

Certificate of Service

☒ I hereby certify that on June 14, 2018, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

All attorneys of record

☐ I hereby certify that on June 14, 2018, I served the attached document by regular US Mail on the following, who are not registered participants of the ECF System:



DARRELL L. MOORE